Attachment G

23 January 2002 Dnr ad 1535/01
Saknr 4119

Food and Control Department
Inspection and Co-ordination Division
Göran Mattsson

Dr. Sally Stratmoen
Chief of Equivalence
United States Department of Agriculture
Food Safety and Inspection Service
International Policy Staff
Office of Policy, Program Development
and Evaluation
1400 Independence Avenue, SW
Washington, DC 20250
USA

Dear Dr. Stratmoen:

Comments on the draft final audit report from Sweden, August 8 through 14, 2001

In an annex to this letter, I attach the comments of the National Food Administration on the draft final audit report.

These comments will be sent by post and by e-mail.

Yours sincerely,

Åsa Breding
Head of the Food Control Department

For your information
Dr. Gary E. Stefan, USDA
Lana Benett, US Embassy Stockholm

Comments from the Chemistry Division 1

- Page 11, point 3: Unknown check samples are included in each set of samples sent to the contracted laboratory, which are doing the screening analysis. But, when a positive field sample demands a confirmation determination by GC-MS, a spiked sample is run at the same time. Thus, check samples definitely have been run for chloramphenicol during the past several years. Besides that, we continuously take part in proficiency testing organised by the Community Reference Laboratory in Fougéres.

- Page 11, point 5: The analysis mentioned in the point must allude to cadmium or lead analysis. Sweden does not run arsenic analysis as said in point 1.

- Page 12, point 6: It is very likely that data on percent recoveries were not available for beta-agonists at the inspection. Probably, owing to the fact that the responsible chemist was not present at the inspection. But, both the screening method and the confirmation method for beta-agonists are validated, which includes recovery experiments. Thus, data on percent recoveries are available for beta-agonists.

- Page 12, point 7: The observation is correct. But, we use separate sheets for data on preparation of standard solutions. These sheets have among other things information on lot numbers. Expiration dates are included in the analytical method.

Comments from the Meat Inspection Division

These comments are generally only reflecting responsibilities of the Meat Inspection Division (MID) and are meant to be part of the answer to USDA.

Comments are made subject by subject.

Lack of documentation concerning corrective actions and preventive measures taken in response to sanitation problems

This is a matter of great concern to the MID and since May 2001 it has been an important part of the work of the AIK Working Group. Manuals and instructions for the in-plant officials have been drawn up and the system is being evaluated at present.

Lack of performance testing of the inspection personnel

This matter will also be dealt with by the above-mentioned working group (AIK WG). Performance testing is planned, mainly for auxiliaries, but to some extent also for the official veterinarians in the slaughterhouses.

Deficiencies in the education and training of the inspection personnel in the requirements for HACCP and Pathogen Reduction.

HACCP training courses are offered on a regular basis. Most of the in-plant officials have attended at least once, many of them even twice.

The term Pathogen Reduction is not commonly used in Sweden. This procedure is most often referred to as slaughter and processing hygiene. Many officials therefore may not be familiar with the expression RP.

Deficiencies in the post-mortem inspection procedures

Instructions have been given to all inspection personnel assigned to the visited establishments. Incisions in the mandibular lymph nodes and inspection of the cut surfaces are required in Swedish legislation. The inspectors of the establishment in question have all been reminded that palpation of the mesenteric lymph nodes is mandatory according to the FSIS requirements.